1 2 3 4 5 6 7 8 9	WILLIAM D. BEIL (admitted pro hac vice) JASON M. HANS (admitted pro hac vice) ROUSE HENDRICKS GERMAN MAY PC 1201 Walnut, 20th Floor Kansas City, Missouri 64106 Telephone: (816) 471-7700 Facsimile: (816) 471-2221 E-mail: billb@rhgm.com E-mail: jasonh@rhgm.com JEFFREY E. FAUCETTE (No. 193066) SKAGGS FAUCETTE LLP One Embarcadero Center, Suite 500 San Francisco, California 94111 Telephone: (415) 315-1669 Facsimile: (415) 433-5994 E-mail: jeff@skaggsfaucette.com			
10	Attorneys for Relator CHRIS MCGOWAN			
11 12 13 14	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN ERANGISCO DIVISION			
15				
16				
17	UNITED STATES OF AMERICA <i>ex rel</i> . CHRIS McGOWAN, an individual,	Case No.: CV-09-5984 (JSW)		
18 19	Plaintiff, v.	STIPULATION AND [PROPOSED] ORDER RE BRIEFING SCHEDULE AND INITIAL CASE MANAGEMENT CONFERENCE		
20	KAISER FOUNDATION HEALTH PLAN,			
21	INC., a California Corporation,			
22	Defendant.			
23				
24	WHEREAS the initial case management	t conference in this matter is currently set for July		
25		t conference in this matter is currently set for July		
26	27, 2012 at 1:30 p.m.;			
27	WHEREAS, Defendant Raiser Foundation Health Plan, Inc. (Raiser) has fried a motion			
$\begin{bmatrix} 27 \\ 28 \end{bmatrix}$	to dismiss the thist Amended Complaint and that motion is set for hearing on september 26, 2012			
20	at 9:00 a.m.;			
	STIP. AND [PROPOSED] ORDER RE BRIEFING AN	D CMC: CASE NO. CV-09-5984 (JSW)		

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- 1					
1	WHEREAS, Relator Chris McGowan's opposition to the motion to dismiss is currently				
2	due to be filed on July 10, 2012 and Kaiser's reply brief is currently due to be filed on July 17,				
3	2012; and				
4	WHEREAS, Relator needs additional time to prepare an opposition brief due to the press				
5	of other business of Relator's counsel, the parties believe that the case management conference				
6	should be continued to the same date as the hearing on the motion to dismiss, and the parties have				
7	agreed not to conduct any discovery until after the Court rules on the motion to dismiss unless the				
8	Court orders otherwise or the scheduling order entered by the Court sets discovery deadlines				
9	which would, actually or as a practical matter, require the parties to conduct discovery prior to the				
0	Court's ruling on the motion to dismiss.				
1	IT IS HEREBY STIPULATED AND AGREED between the undersigned counsel for				
2	McGowan and Kaiser as follows:				
3	1.	McGowan's opposition to the motion to dismiss shall be filed on or before July 24			
4		2012.			
5	2.	Kaiser's reply in support of the opposition shall be filed on or before August 7,			
6		2012.			
7	3.	The initial case management conference, currently set for July 27, 2012 at 1:30 October 19, 2012			
8		p.m., shall be reset to September 28, 2012 at 1:30 p.m. or as soon thereafter as the			
9		Court's calendar permits.			
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1	Dated: July 9, 2012	WILLIAM D. BEIL
2		JASON M. HANS ROUSE HENDRICKS GERMAN MAY PC
3		JEFFREY E. FAUCETTE
4		SKAGGS FAUCETTE LLP
5		By:
6		Jason M. Hans
7		Attorneys for Relator CHRIS McGOWAN
8		
9	Dated: July 9, 2012	DAVID W. O'BRIEN JUSTIN P. MURPHY
10		NIMROD HAIM AVIAD CROWELL & MORING LLP
11		CROWELL & WORING LLF
12		By:
13		David O'Brien Attorneys for Defendant KAISER FOUNDATION
1415		HEALTH PLAN, INC.
16	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
17	Dated: July 10, 2012	
18		
19		Jeffry & White
20		Hon. Leffrey S. White United States District Judge
21		
22		
23		
24		
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26		
27		
28		
	STIP AND IPPOPOSEDI OPDER DE RRIEF	GASE NO. CV-09-5984 (ISW)